

This judgment shall be in full satisfaction of all federal and state claims or rights that plaintiff Jimmy Innocent may have to damages, or any other form of relief, arising out of the alleged acts or omissions of defendants City of New York and the New York City Police Department, or any other official, employee, representative, or agent, either past or present, of the City of New York, or any agency thereof including, but not limited to, the New York City Police Department, in connection with the facts and circumstances that are the subject of this action.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant City of New York hereby offers to allow plaintiff Jimmy Innocent to take judgment against it in this action for the amount of Ten Thousand and One Dollars (\$10,001.00), plus reasonable attorneys' fees and costs to the date of this offer arising out of his federal claims asserted pursuant to 42 U.S.C. § 1983.

-----X-----

Defendants,

THE CITY OF NEW YORK, THE NEW YORK  
CITY POLICE DEPARTMENT, AND UNKNOWN  
Police Officers "JOHN DOE A-Z" individually and  
in their capacities as Police Officers of the NYC  
Police Department,

-against-

Plaintiff,

**RULE 68 OFFER OF  
JUDGMENT**

07 CV 4795 (NRB)

JIMMY INNOCENT,

-----X-----

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed as an admission of liability by defendants City of New York or the New York City Police Department, or any official, employee, representative, or agent of the City of New York, the New York City Police Department, or any other agency of the City of New York, or the City of New York; nor is it an admission that plaintiff Jimmy Innocent has suffered any damages.

Acceptance of this offer of judgment will act to release and discharge defendants City of New York and the New York City Police Department, their successors and assigns, and all past and present officials, employees, representatives, and agents of the City of New York, the New York City Police Department, or any other agency thereof, or the City of New York, from any and all claims under federal or state law that were or could have been alleged by plaintiff Jimmy Innocent in the above-referenced action. Acceptance of this offer of judgment also will operate to waive plaintiff's rights to any claim for interest on the amount of the judgment. Plaintiff agrees that payment of \$10,001 within 90 days of the date of acceptance of the offer shall be a reasonable time for such payment. The judgment shall contain and recite the terms and conditions set forth herein.

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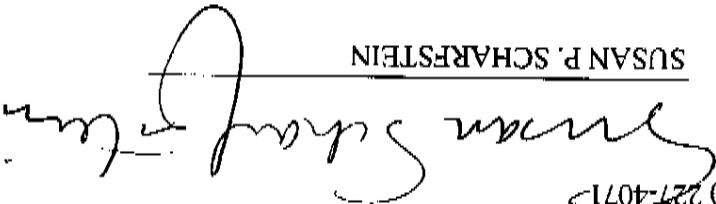
To: Gregory Preston, Esq.  
Preston Wilkins & Martin  
65 Broadway, Suite 508  
New York, NY 10006

Dated: New York, New York  
July 14, 2008

MICHAEL A. CARDOZO  
Corporation Counsel of the City of New York  
Attorney for Defendants City of New York and the  
New York City Police Department  
100 Church Street  
New York, NY 10007  
(212) 227-4071

By:

SUSAN P. SCHARFSTEIN



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
JIMMY INNOCENT, Plaintiff,	-against-
THE CITY OF NEW YORK, THE NEW YORK CITY POLICE DEPARTMENT, AND UNKNOWN Police Officers "JOHN DOE A-Z" individually and in their capacities as Police Officers of the NYC Police Department, Defendants.	RULE 68 OFFER OF JUDGMENT
<b>MICHAEL A. CARDOZO</b> Corporation Counsel of the City of New York Attorney for Defendants City of New York and the New York City Police Department 100 Church Street New York, N.Y. 10007 Of Counsel: Susan P. Scharfstein (SS 2476) Tel: (212) 227-4071 NYCLJS No.:	
Due and timely service is hereby admitted. New York, N.Y. ...., 200... ..... Esq. Attorney for .....	